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**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY PRODUCTS
LIABILITY LITIGATION

THIS DOCUMENT RELATES TO:

ALL MATTERS

MDL No. 3047

Case No.: 4:22-md-03047-YGR-PHK

**JOINT STATUS REPORT REGARDING
FRANCES HAUGEN DOCUMENT
PRODUCTION AND DEPOSITION**

Judge: Hon. Yvonne Gonzalez Rogers
Magistrate Judge: Hon. Peter H. Kang

1 Pursuant to Judge Kang's Order Resolving Discovery Dispute in relation to Frances Haugen (the
2 "Order") (ECF 2197), Defendants Meta Platforms, Inc.; Facebook Holdings, LLC; Facebook Operations,
3 LLC; Facebook Payments, Inc.; Facebook Technologies, LLC; Instagram, LLC; and Siculus, Inc.
4 (collectively, "Meta") and Frances Haugen respectfully submit this Joint Status Report regarding the status
5 of Ms. Haugen's completion of her document production, the service of her categorical privilege log, and
6 the final scheduling of her deposition.

7 On September 5, 2025, Ms. Haugen made a production of 44 documents in response to Request
8 Nos. 6-7 of Meta's document subpoena. Ms. Haugen had already previously produced documents
9 responsive to Request Nos. 5, 22, and 23. The production consists of roughly twelve email threads and
10 one chat thread. Ms. Haugen also produced a privilege log reflecting that two emails and their attachments
11 were withheld for attorney-client privilege and as protected work product.

12 Plaintiffs, Meta, and Ms. Haugen conferred over email regarding the scheduling of her deposition.
13 The earliest date on which all involved parties and Ms. Haugen have availability for a deposition is
14 September 25, 2025. The involved parties agreed that Ms. Haugen's deposition will proceed on that date
15 in San Juan, Puerto Rico. The involved parties agreed that Ms. Haugen will sit for one deposition of 8
16 hours on the record on a single day, with Meta limited to 6 hours on the record and the Plaintiffs (MDL
17 PISD, MDL AGs, JCCP, TN, MA, AR, and NM Plaintiffs) limited to 2 hours on the record, and Meta
18 agreed it will not seek another deposition of her in the above-captioned matter regardless of the resolution
19 of Meta's Motion for Relief from Nondispositive Pretrial Order of Magistrate Judge [ECF No. 2239]
20 (reserving the right to re-ask questions subject to objections or instructions that are overruled by the Court,
21 if any).

1 DATED: September 8, 2025

Respectfully submitted,

3 **DAVIS POLK & WARDWELL LLP**

4 /s/ Antonio J. Perez-Marques

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ATTESTATION

I, Antonio J. Perez-Marques, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1, that the concurrence to the filing of this document has been obtained from each signatory hereto.

Dated: September 8, 2025

By: /s/ Antonio J. Perez-Marques